

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
BROOKLYN OFFICE

RTP:AM/FTB/NR
F. #2020R0040

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

JOHN DOE,

Defendant.

I N F O R M A T I O N

Cr. No. 21-138 (CBA)
(T. 18, U.S.C. §§ 981(a)(1)(C), 1349
and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

-----X

THE UNITED STATES ATTORNEY CHARGES:

CONSPIRACY TO COMMIT HONEST SERVICES FRAUD

1. In or about and between January 2015 and June 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOHN DOE, an individual whose identity is known to the United States Attorney, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud and deprive a company operating in New York State, an entity whose identity is known to the United States Attorney (the "Company"), of its intangible right to the honest services of its employees through bribery and kickbacks, to wit: bribe payments made by DOE and others to employees of the Company to secure the Company's outsourced facilities maintenance work for companies owned by DOE, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire

communication in interstate commerce, writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Sections 1343 and 1346.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant JOHN DOE that, upon his conviction of the crime charged in this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p))



MARK J. LESKO
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JOHN DOE,

Defendant.

INFORMATION

(T. 18, U.S.C. §§ 981(a)(1)(C), 1349 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Nathan Reilly, Assistant U.S. Attorney (718) 254-6196